

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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JACK MARRONE, husband, KAREN	:	
MARRONE, wife, both individually and	:	Civil Action No.: 1:CV-01-0773
in their capacity as parents and guardians	:	
for VIDA MARRONE, a minor, and	:	
MATTHEW ADAM MARRONE,	:	

Plaintiffs	:	
vs.	:	(U.S. District Judge Yvette Kane)

ALLSTATE INSURANCE COMPANY,	:	
LINDA M. EDLEMAN, FRED SCHAFER,	:	
MT. GRETNNA REALTY, and HOUSE	:	<b>JURY TRIAL DEMANDED</b>
MASTERS	:	

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**MOTION FOR EXTENSION OF TIME**

AND Now come the Plaintiffs, by and through their counsel of record, Tarasi, Tarasi & Fishman, P.C. and Louis M. Tarasi, Jr., Esquire, and hereby file this Motion for Extension of Time, and in support thereof says the following:

1. On February 19, 2002, the Honorable Yvette Kane entered an Amended Case Management Order, after a status conference with the parties in this matter. The date set for the close of fact discovery was June 28, 2002.
2. On June 28, 2002, counsel for the parties were diligently pursuing discovery, and on that day met after two-days of depositions to concur (L.R. 7.1) that discovery should be extended in this matter, with consent of this Honorable Court. The parties have engaged in a diligent deposition schedule to date.
3. On June 28, 2002, after two-days of depositions, and after diligently pursuing discovery to date, the parties learned of several additional fact witnesses.

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**FILED**  
 HARRISBURG, PA  
 JUL 02 2002  
 MARY E. D'ANDREA, CLERK  
 Per *[Signature]* Deputy Clerk

4. All counsel for the parties have met and concur in the presentment of this motion for an extension of time. (L.R. 7.1)

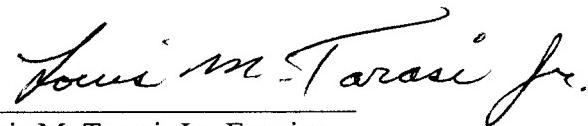
5. All counsel for the parties have met and agree that an additional sixty (60) days is necessary to complete fact discovery.

6. The Plaintiffs therefore request that the Amended Case Management Order be further amended to provide for a sixty (60) day extension of time for fact discovery and other required Court dates accordingly, *i.e.*, that the dates set in the Amended Case Management Order of February 19, 2002 be also extended an additional sixty (60) days.

Wherefore, the Plaintiffs respectfully request that this District Court enter an additional Amended Case Management Order accommodating and extending fact discovery and other requested Court dates accordingly in this case for an additional sixty (60) days for fact discovery and other required Court dates accordingly.

Respectfully submitted,

TARASI, TARASI & FISHMAN, P.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME** was served on counsel for the Defendants on this 1st day of July, 2002, by the United States Mail, First Class, Postage prepaid addressed as follows, and telefax:

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Date: 7-1-02

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